

## Roldan, Lizette

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**From:** Roldan, Lizette  
**Sent:** Tuesday, June 05, 2012 11:31 AM  
**To:** 'sfryinger@iesconde.com'  
**Subject:** REQUEST FOR ADDITIONAL INFORMATION REGARDING NEW LICENSE APPLICATION CONTROL 577186

Docket: 030-38531  
License: 04-32290-03  
Control: 577186

Dear Mr. Fryinger:

This is in reference to your application dated March 21, 2012 requesting Nuclear Regulatory Commission License No. 04-32290-03. In order to continue our review, we need the following additional information:

1. Please provide maximum possession limits (MPL) for the Ir-192 and Se-75. You may increase your MPL by one or two cameras to ensure you never exceed the limit and/or provide room for the purchasing of additional cameras without having to request an amendment. Please remember, that we are only interested in the cameras that will be used in NRC jurisdiction.
2. Please provide a statement: "Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and to transfer these records to a new licensee before licensed activities are transferred, or to assign the record to the appropriate NRC regional office before the license is terminated."
3. You have proposed two names for the Radiation Safety Officer (RSO) position. Please state the individual that should be considered for this position. Both individual are qualified to be named the RSO on the license. Based on the organization chart, it appears that Jeff Eick is the individual you are proposing for that position. **Please note that the NRC does not list an "Alternate Radiation Safety Officer" on a license. The Radiation Safety Officer (RSO) is responsible for the overall management of the radiation safety program; identifying radiation safety problems, initiating, recommending or providing corrective actions; verifying implementation of corrective actions; ensuring compliance with the Commission's rules and regulations and conditions of the license. An RSO should actively participate in the day-to-day management of the radiation safety program. Although the performance of certain radiation safety tasks may be delegated by the RSO to other individuals (such as an alternate Radiation Safety Officer), the responsibility for the overall effectiveness of the radiation safety program and for compliance with NRC rules and regulations and conditions of the license reside with the RSO named on the license.**
4. Please provide a copy of a typical examination AND the correct answers to the examination questions. Please confirm the test is a closed book test.
5. With regard to training of the radiographers and radiographer assistants, specify the qualifications of your instructors in radiation safety principles and describe their experience with radiography. If training will be conducted by someone outside the applicant's organization, identify the course by title and provide the name and address of the company providing the training.

6. Please incorporate into your Radiation Safety Management Procedures that you will provide radiographers and radiographers assistants with regulations in 10 CFR 30.7, 10 CFR 30.9, and 10 CFR 30.10.
7. Please provide a statement: "Before using a new sealed source/device combination, we will have written inspection and maintenance procedures that address the use of the new equipment as a type B transport package. In addition, we will provide training to radiographic personnel before using a new sealed source/device combination.
8. Please provide a statement: "The radiographer must be accompanied by at least one other qualified radiographer, a radiographer assistant, or an individual who has at a minimum met the requirements of 10 CFR 34.43(c). The additional qualified individual shall observe the operations and be capable of providing immediate assistance to prevent unauthorized entry. Radiography may not be performed if only one qualified individual is present."

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 6:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention and refer to Mail Control No. 577186. You may attach your response as a PDF document via e-mail, or fax it to (817) 200-1188. If you have any technical questions regarding this deficiency letter, please call me at (817) 200-1596.

If we do not receive a reply from you by **June 15, 2012** we will assume that you do not wish to pursue your license request and the action will be voided without prejudice to the resubmission of a new license application.

Sincerely,

***Lizette Roldán-Otero, Ph.D.***

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